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6 Attorneys for Plaintiff

7 **IN THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF ARIZONA**

9 Estados Unidos Mexicanos,

10 *Plaintiff*

11 *vs.*

12 Diamondback Shooting Sports, Inc.,
13 *et al.*,

14 *Defendants*

15 **DECLARATION OF YAACOV
(JAKE) MEISELES IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL**

16 NO. 4:22-cv-00472-TUC-RM

17 **DECLARATION OF YAACOV (JAKE) MEISELES IN SUPPORT OF
18 PLAINTIFF'S MOTION TO COMPEL**

19 I, Yaacov (Jake) Meiseles, hereby declare as follows:

20 1. I am a Senior Staff Attorney at Global Action on Gun Violence. I make this
21 declaration in support of Plaintiff's Motion to Compel. Except as otherwise
22 stated, I have personal knowledge of the matters set forth herein and will
23 testify thereto if called upon to do so.
24
25 2. Exhibit 1 is a true and accurate copy of Plaintiff's First Set of Requests for
26 Production of Documents on all Defendants.

1 3. Exhibit 2 is a true and accurate copy of Defendant Diamondback Shooting
2 Sports, Inc.'s July 24, 2024, Responses and Objections to Plaintiff's First Set
3 of Requests for Production of Documents.
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5 4. Exhibit 3 is a true and accurate copy of Defendant SnG Tactical, LLC's July
6 24, 2024, Responses and Objections to Plaintiff's First Set of Requests for
7 Production of Documents.
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9 5. Exhibit 4 is a true and accurate copy of Defendant Loan Prairie, LLC D/B/A
10 The Hub's July 24, 2024, Responses and Objections to Plaintiff's First Set of
11 Requests for Production of Documents.
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13 6. Exhibit 5 is a true and accurate copy of Defendant Ammo A-Z, LLC's July 24,
14 2024, Responses and Objections to Plaintiff's First Set of Requests for
15 Production of Documents.
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17 7. Exhibit 6 is a true and accurate copy of Defendant Sprague's Sports, Inc.'s July
18 24, 2024, Responses and Objections to Plaintiff's First Set of Requests for
19 Production of Documents.
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21 8. Exhibit 7 is a true and accurate copy of Defendant Diamondback Shooting
22 Sports, Inc.'s August 27, 2024, Amended Privilege Log.
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24 9. Exhibit 8 is a true and accurate copy of Defendant SnG Tactical, LLC's August
25 27, 2024, Amended Privilege Log.
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27 10. Exhibit 9 is a true and accurate copy of Defendant Loan Prairie, LLC D/B/A
28 The Hub's August 27, 2024, Amended Privilege Log.

11. Exhibit 10 is a true and accurate copy of Defendant Ammo A-Z, LLC's August
27, 2024, Amended Privilege Log.

12. Exhibit 11 is a true and accurate copy of Defendant Sprague's Sports, Inc.'s
August 27, 2024, Amended Privilege Log.

13. Exhibit 12 is a true and accurate copy of Plaintiff's August 5, 2024, response to
Defendants' Responses and Objections to Plaintiff's First Set of Requests for
Production of Documents.

14. Exhibit 13 is a true and accurate copy of Defendants' August 27, 2024, reply to
Plaintiff's August 5, 2024, response to Defendants' Responses and Objections
to Plaintiff's First Set of Requests for Production of Documents.

15. Exhibit 14 is a true and accurate copy of Memorandum of Intervenor United
States of America in *Lopez et al., v. Badger Guns, Inc., et al*, Case No. 10-cv-
018530 (Milwaukee County Wis. Mar. 30, 2012).

16. Exhibit 15 is a true and accurate copy of the transcript of the oral ruling in
Lopez et al., v. Badger Guns, Inc., et al, Case No. 10-cv-018530 (Milwaukee
County Wis. June 25, 2012).

17. Exhibit 16 is a true and accurate copy of the trial court's order in *Chiapperini
v. Gander Mountain Company, Inc.*, Index No. 14/5717 (Monroe Co. Sup. Ct.,
Sept. 30, 2016).

18. On September 4, 2024, counsel for the parties met and conferred over the
dispute that is the subject of Plaintiff's Motion to Compel.

1 I declare that the foregoing is true under the penalty of perjury.
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4 Dated: September 13, 2024
5 Brooklyn, New York
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/s/ Yaacov (Jake) Meiseles
Yaacov (Jake) Meiseles

CERTIFICATE OF SERVICE

I, Ryan O'Neal, hereby certify that this document was filed with the Clerk of the Court via CM/ECF. Those attorneys who are registered with the Court's electronic filing systems may access this filing through the Court's CM/ECF system, and notice of this filing will be sent to these parties by operation of the Court's electronic filings system.

Dated: September 13, 2024

/s/ Ryan O'Neal
Ryan O'Neal